

FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-3

October 25, 2001

Wyatt A. Stewart, Treasurer
D.C. Republican Committee Federal
Campaign Committee
1501 M Street N.W., Suite 700
Washington, DC 20005

Identification Number:

C00191288

Reference:

April Quarterly (1/1/00-3/31/00), July Quarterly (4/1/00-6/30/00), October

Quarterly (7/1/00-9/30/00), 12 Day Pre-General (10/1/00-10/18/00), 30 Day Post-General (10/19/00-11/27/00) and Year End (11/28/00-12/31/00)

Reports

Dear Mr. Stewart:

This letter is to inform you that as of October 24, 2001 the Commission has not received your response to our requests for additional information dated October 2, 2001. These notices request information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to these requests (copies enclosed).

An adequate response must be received at the Commission by November 14, 2001. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. Requests for extensions of time in which to respond will not be considered. Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

If you should have any questions regarding this matter, please contact Jim Krebs on our toll-free number (800) 424-9530 (at the prompt press 1, then press 2 to reach the

Reports Analysis Division) or our local number (202) 694-1130.

Sincerely,

John D. Gibson

Assistant Staff Director Reports Analysis Division

Enclosures



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20163

Wyatt A. Stewart, Treasurer
D. C. Republican Committee Federal
Campaign Committee
600 Pennsylvania Avenue, SE, #300
Washington, DC 20003

AUG 2 9 2001

Identification Number:

C00191288

REMAIL

Reference:

Year End Report (11/28/00-12/31/00)

Dear Mr. Stewart:

OCT 7 2 79901

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-On Schedule H4 supporting Line 21(a) of the Detailed Summary Page, you have failed to check the appropriate CATEGORY box for the payment(s) made to Bank of America. Please amend your report to disclose the appropriate category.

-Schedule H4 discloses disbursements for Bush Signs activity and Supplies for Volunteers which are categorized as exempt; however, Schedule H2 does not include the allocation ratios for this activity. Please amend Schedule H2 to disclose the omitted ratios.

-On Schedule H4 supporting Line 21(a) of the Detailed Summary Page, you have failed to include the total EVENT YEAR-TO-DATE amounts for Administrative/Voter Drive and Exempt payments. Please amend your report to include the missing EVENT YEAR-TO-DATE total(s).

-Your report discloses limited payments for administrative expenses. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, utilities, salaries, telephone service, office equipment and supplies. Each committee utilizing separate federal and non-federal accounts is required to allocate any

D. C. REPUBLICAN COMMITTEE FEDERAL CAMPAIGN COMMITTEE PAGE 2

administrative expenses between the accounts in proportion to the BALLOT COMPOSITION METHOD derived from FEC Schedule H1. A Schedule H1 must be filed with the first FEC FORM 3X filed at the beginning of each two-year election cycle. 11 CFR §106.5(d)

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR §104.13, and the limitations and prohibitions of 2 U.S.C. §§441a and 441b.

Clarification regarding administrative expenses should be disclosed <u>during</u> <u>each two year election cycle</u> beginning with the first report filed in the non-election year. Please provide the necessary information regarding administrative expenses incurred by your committee and/or amend your report to disclose such expenses according to the referenced provisions of the Act and Commission Regulations.

-Schedule H4 supporting Line 21(a) of the Detailed Summary Page (pertinent portions(s) attached) discloses \$4,853.45 in disbursements for Bush Sign activity on behalf of Bush. Please be advised that a state or local party committee may pay for campaign materials (such as bumper stickers) that are distributed by volunteers in connection with activity on behalf of the party's nominees in a general election. Payments for this type of activity are exempt from the definition of a contribution or expenditure if certain conditions are met. The conditions are that no public advertising may be used, including distribution by direct mail (mailings by a commercial vendor or from commercial lists); all funds used for the activity must be permitted under the Act; none of the funds used may have been designated for a particular candidate; and finally, payments for the activity may not be made from transfers-in from the national committee to specifically fund the activity. For further guidance, please refer to 11 CFR §100.7(b)(15) and (17), 11 CFR §100.8(b)(16) and (18) and to the Campaign Guide for Party Committees.

Please clarify the nature of the aforementioned disbursement(s). If the activity disclosed on your report does not meet the definition of "exempt" activity as described above and if any portion of the expenditures were made on behalf of specifically identified candidates, that amount must be disclosed on Schedule B or F supporting Line 23 or 25 of the Detailed Summary Page as appropriate.

D. C. REPUBLICAN COMMITTEE FEDERAL CAMPAIGN COMMITTEE PAGE 3

-Please clarify all expenditures made for Catering 'Kemp Dinner' on Schedule(s) H4. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedules B, E or F supporting Lines 23, 24 or 25 and include the amount, name, address and office sought by each candidate. 11 CFR §§104.3(b) and 106.1

-Schedule H4 discloses 100% federal activity. Please be advised that by definition, this activity does not qualify as a shared expense to be allocated between your federal and non-federal accounts. This activity should be itemized on a Schedule B for Line 21(b) of the Detailed Summary Page. Any reimbursement from your committee's non-federal account for any portion of this activity is not permissible and must be returned. Please amend your report to clarify this discrepancy.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,

Jim Krebs

Reports Analyst

Jim Kreba

Reports Analysis Division

292

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DISBURSEMENT SCHEDULE H4
[effective 1/1/01]

JOINT FEDERAL/NON-FEDERAL ACTIVITY SCHEDULE

PAGE 95

FOR LINE 21a NAME OF COMMITTEE District of Columbia Republican Committee A. FULL NAME, MAILING ACCRESS & ZIP CODE TOTAL AMOUNT FEDERAL SHARE MON-FEDERAL American Legion Hall BHARE Meeting 224 D Street SE 11/30/00 <u>ვ</u>ჳბ,∞ 140.00 <u>ኢ</u> ነል. ዕር Washington DC ADMINISTRATIVE VOTER DRIVE CATEGORY: □ FUNDRASING □ EXEMPT EVENT YEAR-TO-DATE: DI DRECT CANDIDATE SUPPORT EL FUEL NAME, MAILING ADDRESS & ZIP CODE PURPOSEEVENT DATE TOTAL AMOUNT FEDERAL SHARE MON-PEDERUL Victory Wildher SHARE 424 Hentucky Ave, SE 12/4/00 294,95 Washington, De 109.98 164.97 Notices CATEGORY: DEACMINISTRATIVE MOTER DRIVE C FUNDRAISING DECEMPT EVENT_YEAR-TO-DATE: DIRECT CANCIDATE SUPPORT C. FULL NAME MULTING ADDRESS & ZP CODE PURPOSE/EVENT DATE TOTAL AMOUNT FEDERAL SHARE NON-PEDERAL Mailboxes Etc. SHARE Postage for 611 Pennsylvania Ave, 5E 12/4/60 495.00 Dec. Martin 198,00 Washington, DK 20003 **ኋ** 1,00 CATEGORY: DYADNINISTRATIVE MOTER DRIVE C: FUNDRAISING D DEWY EVENT YEAR-TO-DATE: CI-DIRECT CANDIDATE SUPPORT D. FULL KAME, MALING ADDRESS & ZIP CODE PURPOSE/EVENT TOTAL ANOUNT FEDERAL SHARE NCAL FEDERAL SHARE Thomas Graphics Inc Ծահ 12/04/00 PO Box 142226 4,701.45 Signs 4,101.45 D ADMINISTRATIVE/VOTER DRIVE ☐ FUNDRAIGING **9 ÉVEN**PT EVEN YEAR TO DATE: CHRECT CANEXDATE SUPPORT E. FULL NAME, MAJUNG ADDRESS & ZIP COOR PURPOSE/EVENT MTE TOTAL AMOUNT FEDERAL SHARE NCN-FEDERAL SHARE Victor Wilcher 424 Trentweloy Ave SE 12 04 00 344.54 1,384.62 2,016,12 Washington DC 20003 37 ADMINISTRATIVE VOTER DRIVE C FUNDRAISING was Clayer I. (I) EXEMPT EVENT YEAR-TO-DATE: ☐ CIRECT CANDIDATE GUPPORT F. P.R.L. NAME, MARLING ADORESS & ZIP CODE FURPOSE/EVENT DATE TOTAL AMOUNT PEDERAL SHARE HON-FEDERAL SHARE Jenny Gorski $\mathbf{T}_{n+\mathbf{q}_{n+1}}$ £Σ|u/∞ Geographous University 148,00 59.20 **88.80** 20051 E ACMUNISTRATIVE VOTER DRIVE CATEGORY: FINORAIBING EVENT YEAR TO DATE. □ DIRECT CANDIDATE SUPPORT 2,837,69 6,593.25 SUBTOTAL OF JOINT FEDERAL AND NON-FEDERAL ACTIVITY THIS PAGE TOTAL THIS PERIOD (and page for each like only) (Fed. share to 21 a 1 and non-Fed. share to 21 a R) TOTAL THIS PERIOD FOR THE NON-FEDERAL SHARE (used for fine 31 of the detailed summary page).

DISBURSEMENT SCHEDULE H4

JOINT FEDERAL/NON-FEDERAL ACTIVITY SCHEDULE

PAGE 05

FOR LINE 21a NAME OF COMMITTEE District of Columbia Republican Committee A FULL NAME, MAILING ACCIPESS & ZIP CODE TOTAL AMOUNT **FEDERAL SHARE NON-FEDERAL** Sason Lohen SHARE Georgebour University Intern 12/11/00 44.80 westington, DC 20057 112,20 67.2<u>0</u> EN ADMINISTRATIVE/VOTER DRIVE ☐ FUNDRAISING EXEMPT EVENT_YEAR-TO-DATE: D DIRECT CANDIDATE SUPPORT B. FULL MANE, MANING ADDRESS & ZIP CODE PURPOSÉEVENT DATE TOTAL AMOUNT REDERAL SHARE NONFEDERAL Who's cookin? Cacherina SHARE 2001 Fairview Ave, NE Erro Comm. 12/11/20 181.00 72,4D 108.60 Washington, DC 20002 CATEGORY: **EXAMINISTRATIVENOTER DRIVE** ☐ FLINGRAIBING C EXEMPT EVENT YEAR-TO-DATE: DIRECT CANDIDATE SUPPORT C. FALL NAME, MAILING ADDRESS & ZIP CODE PURPOSEEVENT TOTAL AMOUNT FEDERAL SHARE MONFEDERAL Acet'y & Mongement Servers ᅅᄹ 9th Street, 56 Accomplying 12/1/00 175,00 ባይ,ልዕ Weshington, DC 20003 105.00 C ACMINISTRATIVENOTER DRIVE ☐ FINERAIGING EVENT VEAR TO CLATE: O SIRECT CANDIDATE SUPPORT D. FULL NAME, MAKING ADDRESS & ZIP CODE. **PURPOSE/EVENT** TOTAL AMOUNT DATE FEDERAL SHARE NON FEDERAL SHARE Front Nichols Transportalis 3220 S.9*Street 12/11/00 152.00 132,00 Bush Sign Placewood ∿ይ^ Arlington, VA 22204 CATEGORY: C) ADMINISTRATIVE/VOTER DRIVE **CYÉXEMPT** □ PUNDRABSING EVENT YEAR-TO CATE: □ DIRECT CANDIDATE SUPPORT E. FULL NAME, MALLING ADDRESS & ZIP CODE NON-FEDERAL **PURPOSE/EVENT** TOTAL AMOUNT FEDERAL SHARE Jonathan Benjaman والموالعم SHARE 2862 28th Street, NU 12/11/00 601.77 Duruk Aur ሬ၀ι.ኅኅ Washington, Dc 20008 VolunțeotS □ PUNDRAISING □ ADMINISTRATIVE VOTER DERVE DYEXENT EVENT YEAR TO CATE CRECY CANDENTE SUPPORT F. FULL NAME, MALENG ACCRESS & 22P CODE **PULIFOSÉ/EVENT** TOTAL AMDUNIT FEXERAL SHARE NON-FEDERAL SWATE. Laser Courier Caupior 12 11/00 1522 1 Street NW ባ3. ኋፄ 29.31 Services 43,99 Washington, Oc S ADVINISTRATIVE YOTER DRIVE CATEGORY: PUNDANSING O EXEMPT <u> Svent</u> Year-To-date: C) DIRECT CANDIDATE SUPPORT 1,295,05 **약**ንዕ.ኋቄ 324.ባገ SUBTOTAL OF JOINT FEDERAL AND NON-FEDERAL ACTIVITY THIS PAGE TIDITAL THIS PERIOD (and page for each line only) (Fed. share to 21 all and non-Fed. elegan to 21 all) TOTAL THIS PERIOD FOR THE NON-FEDERAL SHARE (used for The 31 of the detailed summary page) **FEOLISMOS**

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